

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH PUDDU, MARK GHITIS, VALERY
BURLAK, and ADAM BUTTER,

Plaintiff,

vs.

6D GLOBAL TECHNOLOGIES, INC., NYGG
(ASIA), LTD., BENJAMIN TIANBING WEI
A/K/A BENJAMIN WEY, TEJUNE KANG,
MARK SZYNKOWSKI, TERRY MCEWEN,
AND NYG CAPITAL LLC D/B/A NEW YORK
GLOBAL GROUP,

Defendants.

Case No.: 15-cv-8061-AJN

**PLAINTIFFS' NOTICE OF MOTION
FOR FINAL APPROVAL OF
PROPOSED CLASS ACTION
SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and the Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (the "Preliminary Approval Order") (Dkt. No. 227), Lead Plaintiffs Joseph Puddu and Mark Ghitis and Named Plaintiffs Valery Burlak and Adam Butter ("Plaintiffs"), by their undersigned counsel, hereby move this Court, the Honorable Alison J. Nathan, on February 23, 2021 at 2:00 p.m., or as soon thereafter as the parties can be heard, for an Order granting final approval of the proposed class action settlement.

Plaintiffs will rely on the accompanying memorandum of law, the Declaration of Jonathan Horne and exhibits attached thereto, and such further argument and briefing as may be presented at or before any hearing. Plaintiffs will file a proposed final order and partial final judgment with their reply, to account fully for any requests for exclusions or objections received by the February 2, 2021 deadline.

Dated: January 26, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Jonathan Horne
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CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Jonathan Horne